

Policy: Dormant Account Policy

Company: ATOMIQ MARKETS LTD

Version: *01/2026*

Effective Date: *01/11/2026*



Table of Contents

1. INTRODUCTION 3
2. LEGAL & REGULATORY FRAMEWORK 3
3. DEFINITIONS 4
   3.1. Trading Activity 4
   3.2. Dormant Account 4
   3.3. Dormant Account Fee 4
   3.4. Inactive Account 4
4. PROCEDURES FOR THE DETERMINATION AND TREATMENT OF INACTIVE AND DORMANT ACCOUNTS 5
5. DORMANT ACCOUNT FEES 6
6. INACTIVE ACCOUNTS – CLOSE MODE ONLY 6
7. RE- ACTIVATION PROCEDURE 7
8. REVIEW OF THE POLICY 7



1. INTRODUCTION

ATOMIQ MARKETS LTD (the "Company") is a licensed entity by the Financial Services Commission of Mauritius ("FSC") as an Investment Dealer (Full Service, excluding Underwriting) pursuant to the Financial Services Act 2007 and the Securities Act 2005; license number GB24203947.

The purpose of this **Dormant Account Policy** (the "Policy") is to define the Company's procedures and internal controls for the identification, management, charging of fees, restriction, and re-activation of dormant and inactive client trading accounts, in a manner that ensures:

- Fair treatment of clients;
- Transparency of fees and actions;
- Adequate safeguarding of client assets; and
- Compliance with applicable Mauritian regulatory requirements.

This Policy applies to all retail and professional client trading accounts maintained with the Company, across all trading platforms and account types offered by the Company.

2. LEGAL & REGULATORY FRAMEWORK

This Policy is established in accordance with, and taking into consideration, the following legislative and regulatory framework applicable in Mauritius:

- Financial Services Act 2007, including provisions relating to fair dealing, conduct of business, and record-keeping;
- Securities Act 2005, including obligations relating to client accounts, client asset protection, and disclosure of fees and charges;
- FSC Rules, Codes, and Circulars relating to:
  - Conduct of business;
  - Client asset segregation;
  - Fair disclosure of fees and terms;
  - Ongoing client due diligence and record retention.



3. DEFINITIONS

For the purposes of this Policy, the following definitions apply:

3.1. Trading Activity

Trading activity includes any of the following actions performed by the client:

- Opening or closing of a trade or position;
- Execution of a transaction;
- Deposit of funds into the trading account.

** Withdrawals alone do not constitute trading activity.

3.2. Dormant Account

A Dormant Account is any client trading account where no trading activity (as defined above) has taken place for a continuous period of ninety (90) consecutive calendar days.

3.3. Dormant Account Fee

A Dormant Account Fee is a periodic charge of USD 70 (or equivalent to this amount depending on the wallet currency of the client) applied to a Dormant Account in accordance with this Policy.

3.4. Inactive Account

An Inactive Account is any client trading account where no trading activity has taken place for a continuous period of one hundred fifty (150) consecutive calendar days.



4. PROCEDURES FOR THE DETERMINATION AND TREATMENT OF INACTIVE AND DORMANT ACCOUNTS

4.1. The Company maintains automated and manual monitoring controls to identify accounts that meet the criteria for Dormant or Inactive status.

4.2. Account status is reviewed on a daily basis by the Back Office / Operations function under the oversight of Senior Management.

4.3. Once an account reaches 90 consecutive days without trading activity, it shall be classified as a Dormant Account.

4.4. Prior to the application of any Dormant Account Fee, the Company shall ensure that:

- The fee is clearly disclosed in the Company's Terms and Conditions; and
- Clients have access to the Policy through the Company's website or upon request.

4.5. The Company shall maintain accurate internal records evidencing:

- Date of last trading activity.
- Date of status change.
- Fees applied; and
- Client communications, where applicable.



5. DORMANT ACCOUNT FEES

5.1. Upon classification of an account as Dormant, a **Dormant Account Fee of (US)$70** (or equivalent to this amount depending on the wallet currency of the client) shall be applied on the 91st consecutive day following the date of last trading activity.

5.2. The Dormant Account Fee shall be deducted as follows, from:

a) The trading account positive balance; and/or then

b) The client's wallet positive balance (**upon discretion of the Management*)

5.3. Dormant Account Fees shall continue to be applied periodically (i.e. on a monthly basis), as long as the following are applicable:

(a) a positive balance exists in the client's trading account and/or wallet.

(b) The trading account is still considered Dormant account.

5.4. No Dormant Account Fee shall be applied where the account balance is zero or if the Trading account does not meet the criteria set forth of Dormant account.

5.5. The Company shall not permit Dormant Account Fees to result in a negative client balance.

5.6. All Dormant Account Fees charged shall:

- Be accurately recorded.
- Be reflected in client statements; and
- Be available to the client upon request.

6. INACTIVE ACCOUNTS – CLOSE MODE ONLY

6.1. Upon a trading account reaching 150 consecutive days without trading activity, the account shall be classified as an Inactive Account.

6.2. Inactive Accounts shall automatically be placed into "Close Mode Only", meaning:

- No new trades may be opened.
- Existing positions may only be reduced or closed; and
- Deposits may be accepted solely for the purpose of facilitating closure of open positions or settlement of obligations.

6.3. Dormant Account Fees shall continue to apply to Inactive Accounts until no positive balance remains in the wallet or trading account.

6.4. The application of Close Mode Only is designed as a risk-mitigation and client-protection control and does not constitute termination of the client relationship.



7. RE- ACTIVATION PROCEDURE

In the event that the Client wishes to re-activate his account(s) (i.e. deposit new funds and / or start trading), the Client should contact the Company via email at support@atomiqmarkets.com.

The Company shall review the Client's request, re-activate the account and cease to deduct the Dormant Account Fee, but it shall not refund any Dormant Account Fees previously deducted.

No penalties shall be imposed for reactivation, which shall be processed free of charge, subject to satisfactory completion of any required updated due diligence or KYC reviews.

8. REVIEW OF THE POLICY

This Policy shall be reviewed at least annually and whenever:

- There are material changes to applicable laws or FSC regulatory requirements;
- There are material changes to the Company's business model, client base, or fee structure.

Any amendments to this Policy shall be communicated to clients in a timely manner through appropriate channels, including electronic notification where applicable.

For further information regarding this Policy, clients may contact the Company at: support@atomiqmarkets.com.